

Chapter 3—Emissions Inventory Structure

Emissions inventory information must be stored in a standardized manner that accurately represents a site's processes. This chapter begins with a section on identifying emission sources and a general discussion of how to represent these sources in the standardized emissions inventory format. The representation of sources in this standardized format is referred to as EI structure. Examples of common industrial processes and their appropriate structural representation are discussed. Finally, the chapter concludes with a section on modifying existing EI structure.

Identifying Emission Sources

To develop an accurate EI, each emission source at the site must be identified. Using all available tools—including, but not limited to, plot plans, site maps, comprehensive process flow diagrams, and knowledge of the site's processes, list all equipment and operations that may result in air emissions, such as:

- combustion sources
- storage tanks
- loading operations
- piping component fugitive areas
- wastewater collection and treatment systems
- process areas (for example, building vents, process vents, or reactors)
- evaporative losses (for example, in surface coating, solvent degreasing, railcar or tank truck cleaning, or printing operations)
- plant roads

Guidelines for Including Sources in Emissions Inventory Structure

Depending upon the type of emissions source, the owner or operator of the regulated entity needs to add the emissions source to the EI as an individual source, group the emissions source with other similar sources, or possibly omit the source from the EI.

Sources that Must Be Added to the EI and that May Be Grouped as Collective Sources

Each emissions source at a site must be added with associated emissions to the EI if it meets **any** of the following criteria:

- It emits 1 ton or more of any regulated pollutant.
- It emits 0.1 ton or more of any toxic chemical or hazardous air pollutant.
- It emits 0.001 ton or more of mercury, lead, or any individual HAP or aggregate HAP listed in any TCEQ-enforceable document such as a permit, regulation, or commission order.
- It is listed in any TCEQ-enforceable document such as a permit, regulation, or commission order.
- *Please note:* a registered permit by rule (PBR) that includes a certification of federally enforceable emission limits (e.g., using Form PI-7-CERT, designated form TCEQ-20182) is a TCEQ-enforceable document.

If individual sources do not meet the requirements listed above, these sources may be omitted from the EI, provided that the collective emissions from all such unreported sources total less than 5 tons of any regulated pollutant and less than 1 ton of aggregate HAPs. If individual sources do not meet the requirements listed above, but exceed the collective emissions totals outlined above, then these sources must either be:

- individually added with associated emissions to the EI, or
- grouped according to the “Collective Sources” section of this chapter, and added with associated emissions to the EI as a collective source.

The EAS encourages the grouping of similar small emission sources. When creating a new path for grouped sources (grouped facilities) refer to the guidelines in the “Collective Sources” section. If small sources or small facilities are grouped in a permit, group these sources in a similar manner when adding them to the EIQ.

Representing the Structure of a Regulated Entity in the Emissions Inventory

For EI purposes, the term *facility* refers to a source, unit, device, structure, or area capable of generating air contaminants. The point where air contaminants are emitted to the environment is called the emission point. Some contaminants are controlled by an abatement device prior to being emitted at the emission point.

Facilities and Facility Identification Numbers

Each facility at the site must be identified. Examples of a facility include:

- a reciprocating engine
- a spray booth
- a chemical storage tank
- a flare

Each facility at the site must be given a unique alphanumeric code called a *facility identification number* (FIN). The FIN cannot be longer than 10 characters.

Examples of possible FINs for the facilities listed above are:

- COMP01
- SPRBTH
- TANK03
- FLR

Every FIN must be linked to at least one emission point.

Emission Points and Emission Point Numbers

An emission point is the spatial location (point) where emissions enter the atmosphere. Every facility has at least one emission point. Examples of emission points include:

- an engine exhaust stack
- a spray-booth vent
- a process fugitive area
- a building vent

Each emission point must be given a unique alphanumeric code called an emission point number. The EPN cannot be longer than 10 characters. Examples of possible EPNs for the emission points listed above are:

- STK1A
- VENT
- FUG
- BLDGVENT

Every EPN must be linked to at least one facility.

Abatement Devices and Control Identification Numbers

An abatement device, also called a control device, is a piece of equipment or a recognized operational procedure that limits, controls, or abates emissions. Each abatement device at the site must be identified. Examples of abatement devices include:

- a flare
- a scrubber
- a condenser
- a vapor recovery unit
- a fugitive leak detection and repair program

Each abatement device must be given a unique alphanumeric code called a *control identification number*. The CIN cannot be longer than 10 characters. Examples of possible CINs for the abatement devices listed above are:

- FLR
- SCRUB4
- VAPORCOND
- VRU
- LDAR2

Every CIN must be associated with at least one facility (identified by a FIN) that is linked to an emission point (identified by an EPN).

Some control devices, such as thermal oxidizers and flares, also create emissions and must be represented as both facilities and control devices. For more information on this subject, refer to “Representing Combustive Abatement Devices” later in this chapter.

Emission Paths

An emission path is the route a contaminant must travel from the facility to the abatement device to the atmosphere via the emission point. Every emission path must include at least one facility and one emission point.

Collective Sources

Small emission sources or facilities that emit a small amount of emissions, have similar source classification codes (SCCs), and emit similar emissions may be grouped as one collective emission source. The collective emission source will be given a unique FIN and be added to the EI. A small emission source or a small facility must meet all of the following criteria:

- the source emitted less than 1 ton of each regulated pollutant;
- the source emitted less than 0.1 ton of any toxic chemical or hazardous air pollutant; and
- the source is not required to be included in the inventory’s structure under any other TCEQ enforceable document, such as a permit or a commission order.

For example, 20 similar aggregate storage piles each emitted 0.5 tpy of PM₁₀. These emissions need to be represented in the EIQ since collectively the storage piles emitted 10 tpy of PM₁₀. If the storage piles are not individually represented in any permits, they could be grouped together under a single facility.

If small sources or small facilities are grouped in the regulated entity's air permits, group these sources as collective FINs in a similar manner when adding them to the EIQ. Use the following guidelines when adding collective sources to the EIQ.

Facility Guidelines

Group only those sources with similar SCC and similar emissions as one collective facility. Create different collective FINs for each distinct type of process and equipment. Examples of different source types that can be grouped in a collective FIN include:

- solvent cleaning areas and equipment
- painting areas and equipment
- piping component fugitive areas
- VOC loading operations
- tanks
- internal combustion sources
- external combustion sources
- other sources as appropriate

Emission Point Guidelines

Unless all of the sources in a collective facility group vent to a common control device, a collective facility group should have a fugitive area emission point.

- Complete the Emission Point Information—Fugitive form for the fugitive area emission point. The length and width of the fugitive area is the length and width of the entire site, and the height of the fugitive area is the estimated height reached by the fugitive emissions. For a trench or impoundment, enter a default height of 3 feet.
- If the collective emission point is represented in any air permits for the site, the TCEQ recommends using the same naming convention as the air permit when assigning the EPN; otherwise, the EPN can begin with the character string "GRP" such as EPN: GRPTANKS or EPN: GRPSOURCES.
- When supplying UTM coordinates for the collective emission point, use the UTM coordinates for the site centroid.

Abatement Device Guidelines

Add abatement devices to collective facilities. If the abatement device only abates certain sources in the grouped facilities, note this in the “Path Comments” portion of the EIQ.

For assistance with collective source structure, please contact the EAS Help Line at 512-239-1773.

Representing Combustive Abatement Devices

Most abatement devices do not generate their own emissions and should therefore appear only as control devices within the EI structure. However,

a combustive abatement device generates emissions while burning contaminants and must be represented in the EI structure as an emission source and as an abatement device.

Emergency flare structure is similar to process flare structure, except that the emergency flare may not need to be linked to each individual facility. If an emergency flare controls emissions from a large number of sources, then associating it with each facility would greatly increase the inventory’s size without substantially improving its quality. For emergency flares, the emissions path will be from the process to the abatement device to the flare. Thus, the preparer would create the path FIN: PROCESS / CIN: FLARE / EPN: FLARE. All undestroyed waste gas emissions should be reported in this path. Another emissions path will have to be created to report the emissions generated by the combustion of the waste gas at the flare. The products of combustion should be reported at the path representing the flare as the source and flare as the emissions point, FIN: FLARE / EPN: FLARE.

For assistance with establishing correct flare structure, please contact the EAS.

Appropriate Structural Representation of Common Industrial Processes

This section discusses appropriate structural representation of some common emissions sources. For assistance with establishing the correct structure for a process, please contact the EAS.

Cooling Towers

In order to promote data consistency within the STARS database, represent each cooling tower as one facility with one associated **stack** emission point, regardless of whether it is a natural-draft or a mechanical-draft tower. A mechanical-draft tower with multiple cells should also be considered one facility with one stack emission point; the number of cells should be represented as one of the parameters under the FIN group and profile characteristics on the EIQ.

Cooling towers are designed with drift eliminators. A drift eliminator is part of a cooling tower's basic design and is not considered an abatement device from a structural standpoint.

Glycol Units and Amine Units

For the purposes of establishing EI structure, treat an amine unit as a glycol unit, using the following guidance.

From the list that follows, at least paths 1 and 2 are needed to represent each glycol unit, and 3 is optional:

- a still path for reporting emissions from the gas-stripping process
- a reboiler path for reporting combustion emissions
- a path for the flash tank, if air emissions from the flash tank are authorized separately from the glycol still emissions

The correct way to represent emissions for each path depends on how those emissions are vented or routed. The flash tank is not explicitly listed in the examples below; please contact the EAS for further assistance.

Venting to Separate Stacks

When still and reboiler emissions are vented through separate stacks, represent each unit as a separate facility linked to its own emission point. In other words, each unit should be represented as its own emission path, as shown in Figure 3-1.

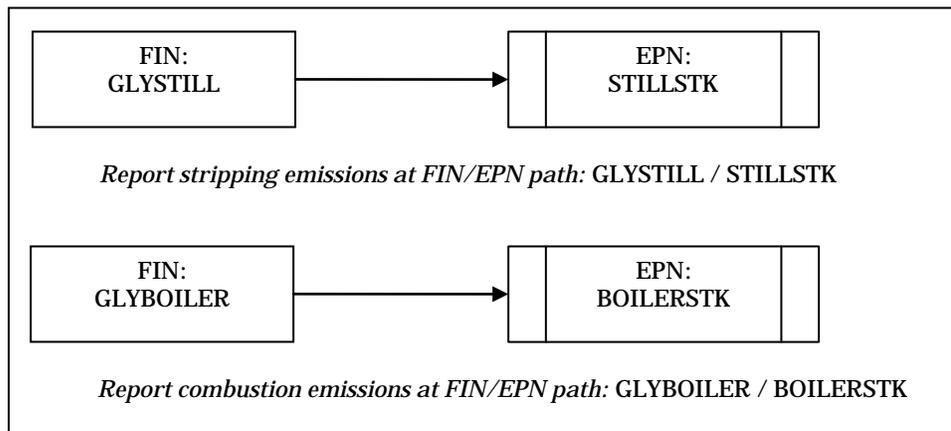


Figure 3-1. Glycol Unit—Separate Still and Reboiler Vents

Venting to a Common Stack

If glycol still emissions and reboiler emissions both vent through a common stack, represent the glycol still and reboiler as two facilities that are linked to a single emission point. This structure is shown in Figure 3-2.

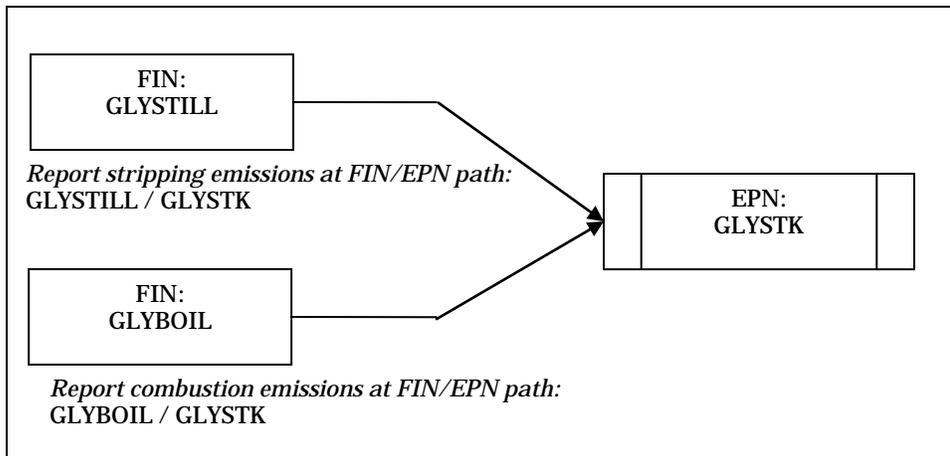


Figure 3-2. Glycol Unit—Common Still and Reboiler Vents

Routing Still Emissions to a Flare

If glycol still emissions are routed to a flare, the glycol still and reboiler should be represented as shown in Figure 3-3. Represent the glycol reboiler as its own facility linked to its own emission point. Represent the glycol still and flare as separate facilities linked to a single emissions point, with an abatement device added to the glycol still.

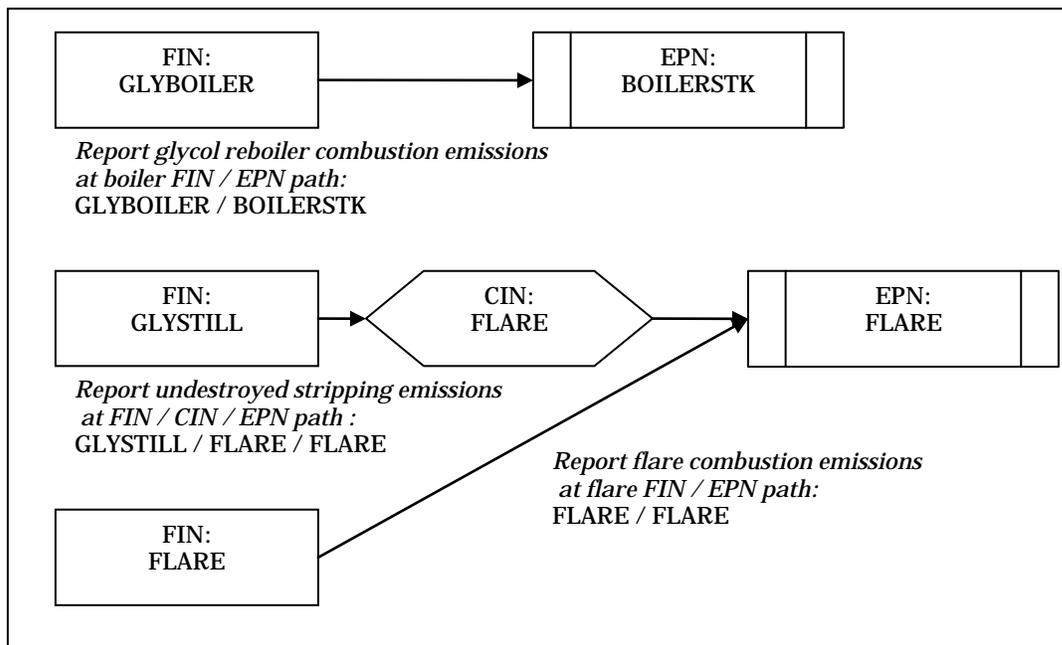


Figure 3-3. Glycol Unit—Flared Still Emissions

Routing Still Emissions through the Reboiler

If glycol still emissions are routed through the reboiler and combusted, the still and reboiler should be represented as shown in Figure 3-4. Represent the glycol still and glycol reboiler as separate facilities linked to a single emission point, with an abatement device added to the glycol still.

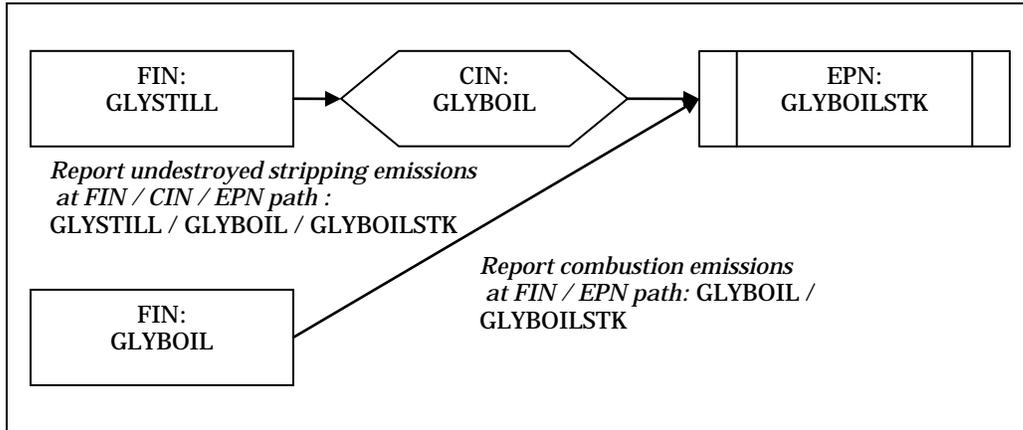


Figure 3-4. Glycol Unit—Still Emissions Routed Through Reboiler

Sulfur Recovery Units

A sulfur recovery unit (SRU) is not an abatement device, but rather a unit generating hydrogen sulfide emissions. Some common SRU structures are shown in Figures 3-5 through 3-8.

An Unabated SRU

If the SRU emissions are not controlled by an abatement device, represent the SRU as a single facility linked to a single emission point, as shown in Figure 3-5.

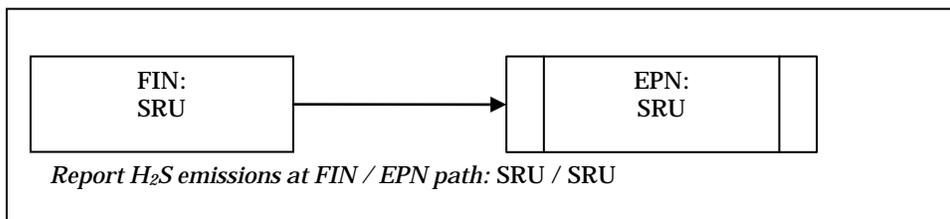


Figure 3-5. Sulfur Recovery Unit—Unabated

Controlled by a Scrubber

If the SRU emissions are controlled by a scrubber, represent the SRU as a single facility linked to a single emission point, with an abatement device added to the SRU, as shown in Figure 3-6.

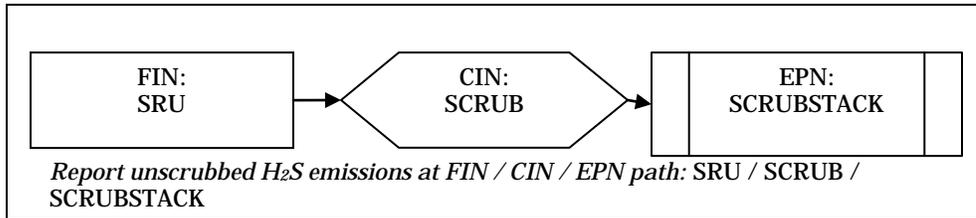


Figure 3-6. Sulfur Recovery Unit with Scrubber

Routing SRU Emissions to an Incinerator

If the SRU emissions are controlled by an incinerator, represent the SRU and incinerator as two separate facilities linked to a single emission point, with an abatement device added to the SRU, as shown in Figure 3-7.

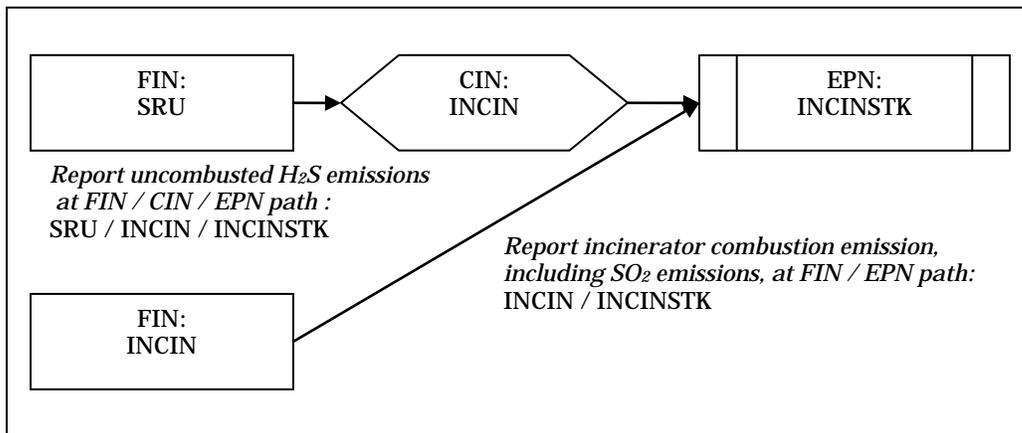


Figure 3-7. Sulfur Recovery Unit with Incinerator

Routing SRU Emissions through a Scrubber Prior to an Incinerator

If the SRU emissions are first controlled by a scrubber and then routed to an incinerator, represent the SRU and incinerator as two separate facilities linked to a single emission point, with two different abatement devices added to the SRU, as shown in Figure 3-8.

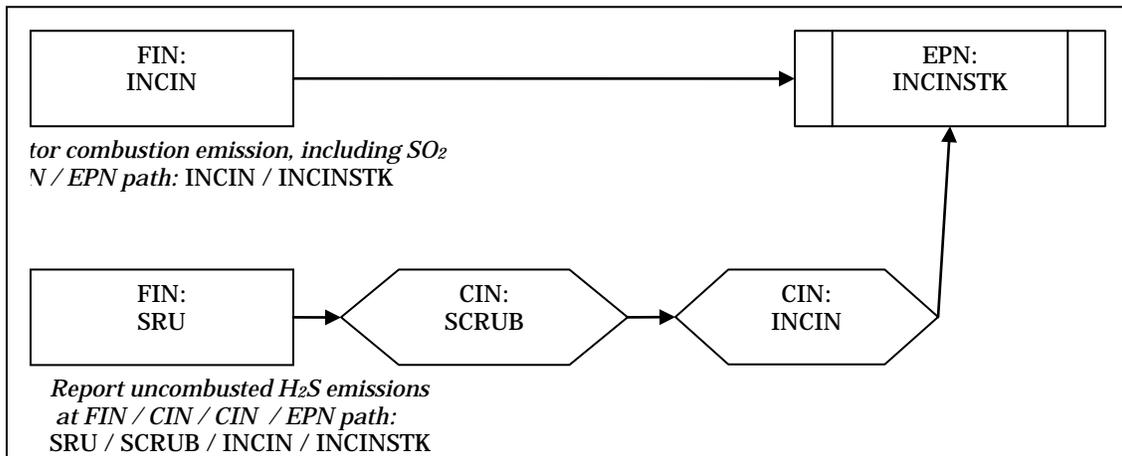


Figure 3-8. Sulfur Recovery Unit with Scrubber Prior to Incinerator

Loading Operations

Unabated Loading Operation

If loading emissions are not routed to an abatement device, represent the loading area by a single facility linked to a fugitive-type emission point, as shown in Figure 3-9.

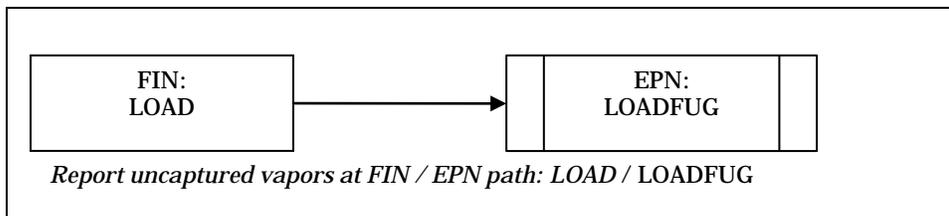


Figure 3-9. Loading Area—Unabated

Controlled by a Flare

If loading emissions are controlled by a flare, the emissions paths will be from the loading operation to the fugitive loading area and the flare emission points. Represent the loading operation and flare as two separate facilities linked to a single emission point, with an abatement device added to the loading operation. Then report the uncaptured vapors that are not routed to the flare at a separate fugitive loading-area emission point linked to the loading operation facility. Report the emissions from the captured, undestroyed vapors at the abatement device. Be sure to indicate the capture efficiency in the facility comment field. Figure 3-10 illustrates proper structure for a loading area controlled by a flare.

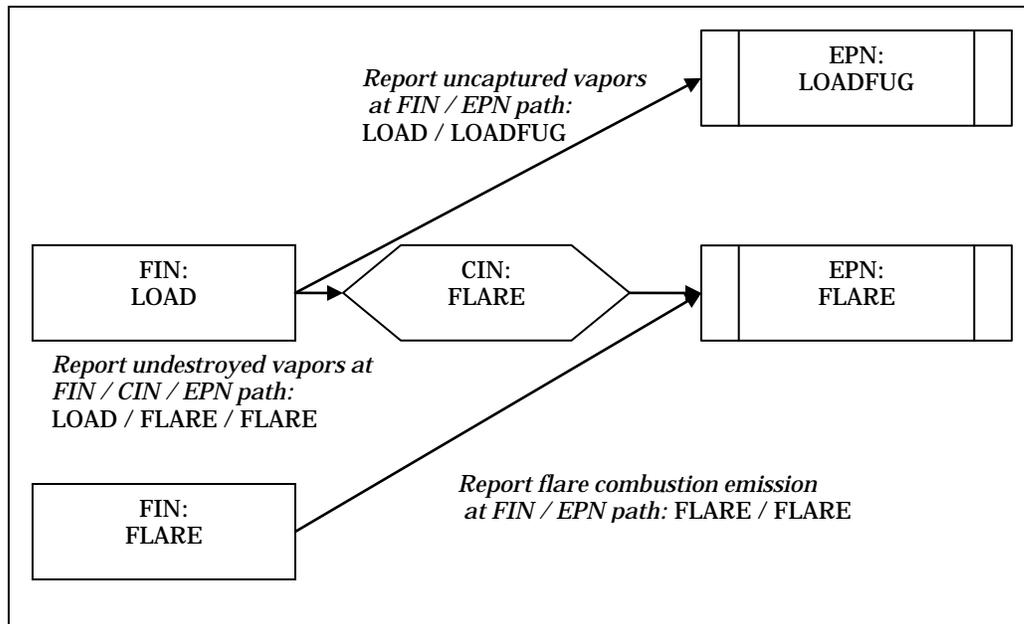


Figure 3-10. Loading Area Controlled by a Flare

Blowdown Operations

Compressor engines and other forms of process equipment are routinely taken offline for periodic maintenance or emergency shutdown. Before maintenance can be performed, the gas in the lines is usually vented. These vented gases can result in significant emissions depending on maintenance schedules, line pressures, and the volume of gas released. The emissions can either be vented to the atmosphere or sent to a control device.

Venting through Separate Stacks

Blowdown emissions should be reported at a VOC Process facility path if combustion and blowdown emissions are vented through separate stacks, as shown in Figure 3-11. Represent the compressor engine and compressor blowdowns as two separate facilities linked to two different emission points.

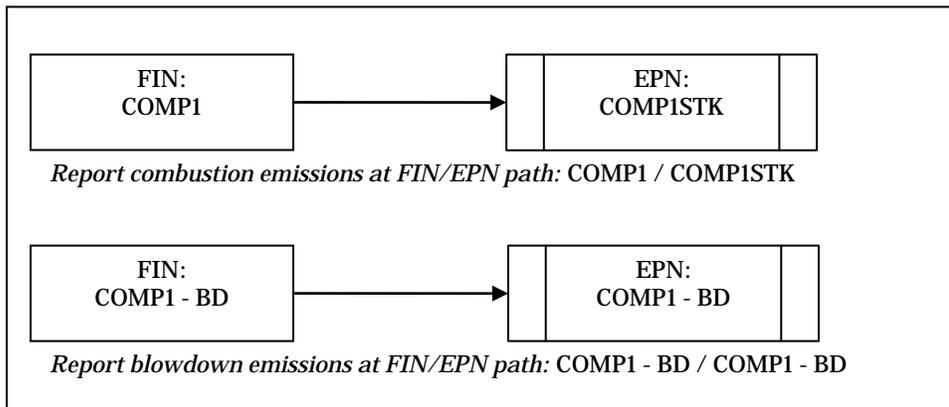


Figure 3-11. Blowdown Operations—Separate Compressor Engine and Blowdown Vents

Venting to a Common Stack

If combustion and blowdown emissions are vented through the same stack, represent the structure as shown in Figure 3-12. Represent the compressor engine and compressor blowdowns as two facilities linked to a single emission point.

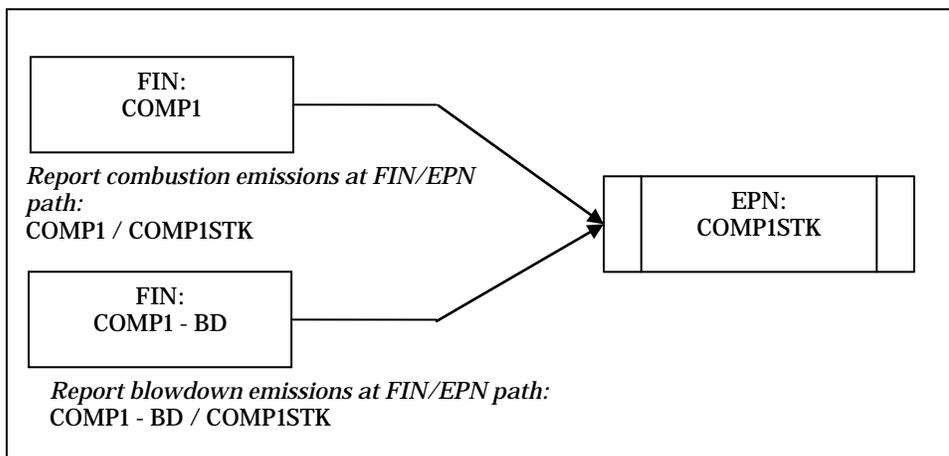


Figure 3-12. Blowdown Operations—Common Compressor Engine and Blowdown Vent

Blowdown Emissions Routed to a Flare

If blowdown operations are routed to a flare, represent the combustion and blowdown emissions as shown in Figure 3-13. Represent the compressor engine as a single facility linked to a single emission point. Represent the compressor blowdowns and flare as two facilities linked to a single emission point, with an abatement device added to the compressor blowdowns.

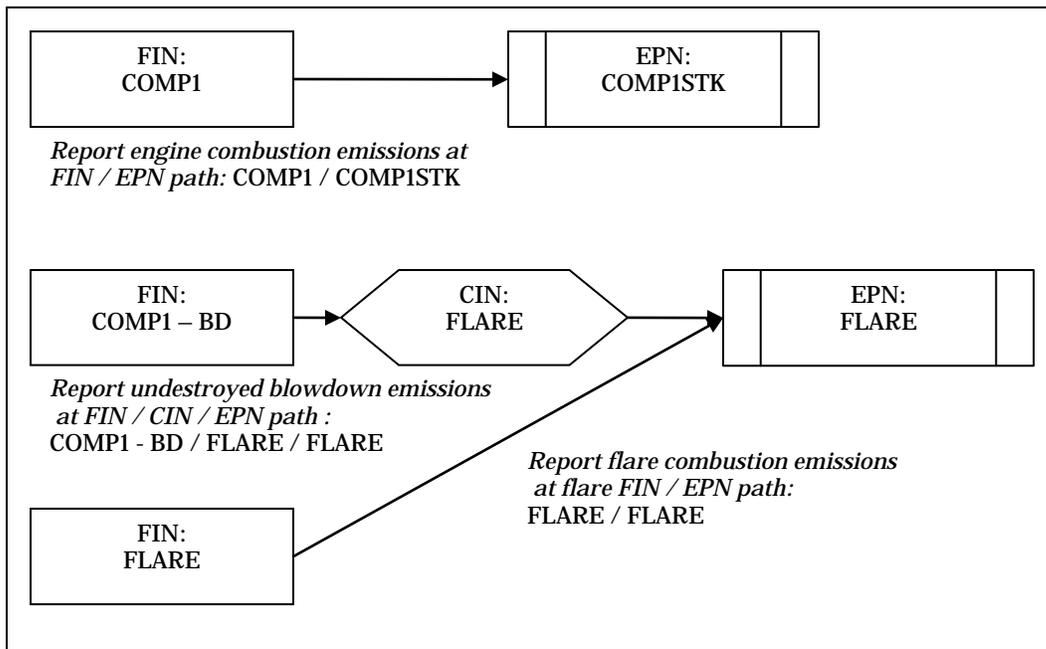


Figure 3-13. Blowdown Operations—Flared Blowdown Emissions

Grouping as a Collective Emission Source

If the blowdown operations do not meet the requirements for reporting as individual sources, the emissions can be grouped together as a collective emission source. One facility and one emission point can represent two or more collective blowdown-operations facilities, as shown in Figure 3-14. Represent each compressor engine as a single facility attached to a single emission point. Represent the grouped compressor blowdowns as a single facility attached to a single emission point.

See “Collective Emission Sources” in this chapter for details on reporting requirements and how to represent the emission point for such sources.

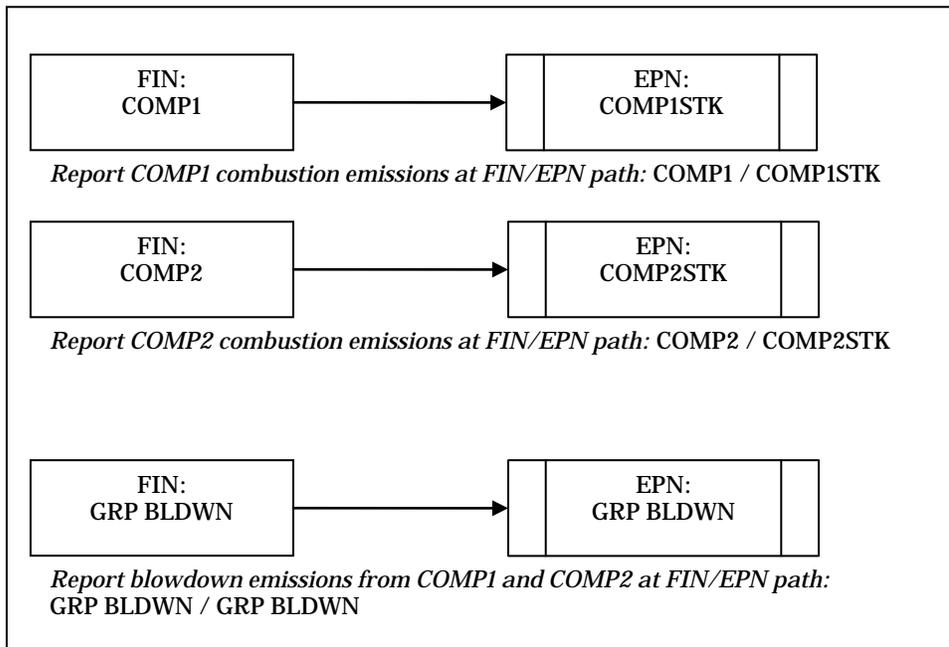


Figure 3-14. Blowdown Operations—Grouped Compressor Blowdowns

Surface Coating Operations

Unabated Paint Booth

If emissions from a paint booth are completely uncontrolled, represent the booth as a single facility linked to a single emission point path, as shown in Figure 3-15.

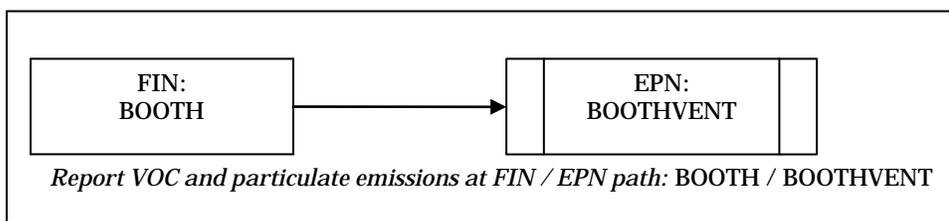


Figure 3-15. Paint Booth—Unabated

Controlling Particulate Emissions with a Filter

If emissions are filtered to control particulate emissions, represent the paint booth as a single facility linked to a single emission point, with the filter added as an abatement device for the paint booth, as shown in Figure 3-16.

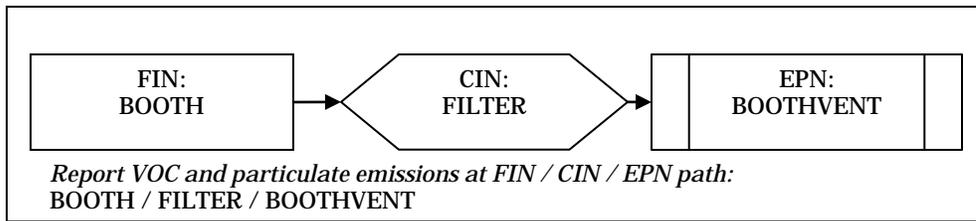


Figure 3-16. Paint Booth—Particulate Emissions Abated by a Filter

Routing VOC Emissions to an Incinerator

If paint-booth emissions are routed to an incinerator to control VOC emissions, represent the booth and incinerator as two facilities linked to a single emissions point, with an abatement device added to the booth. Then link a second emission point to the booth, as shown in Figure 3-17.

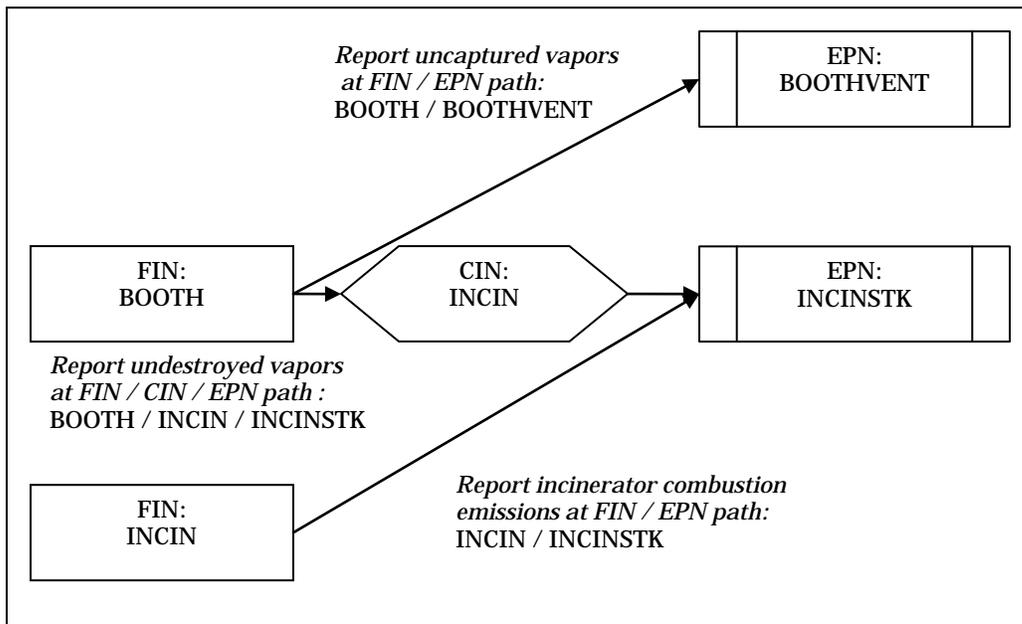


Figure 3-17. Spray Booth Controlled by an Incinerator

If coated surfaces are heat dried, be certain to include the drier in the EI structure.

Aggregate Operations

Emission sources from aggregate operations include storage piles and material transport and processing operations, such as crushing, grinding, milling, mixing, calcinating, and kilning. Represent each step in material storage, transport, and processing with a separate path made up of a unique FIN and EPN.

Storage Piles

Classify aggregate storage piles by material type and particle size—for example, represent a site using a water-spray system to control emissions from a fine-particle pile and a coarse-particle pile composed of the same material as two facilities linked to two emission points, with a single abatement device added to each facility, as shown in Figure 3-18.

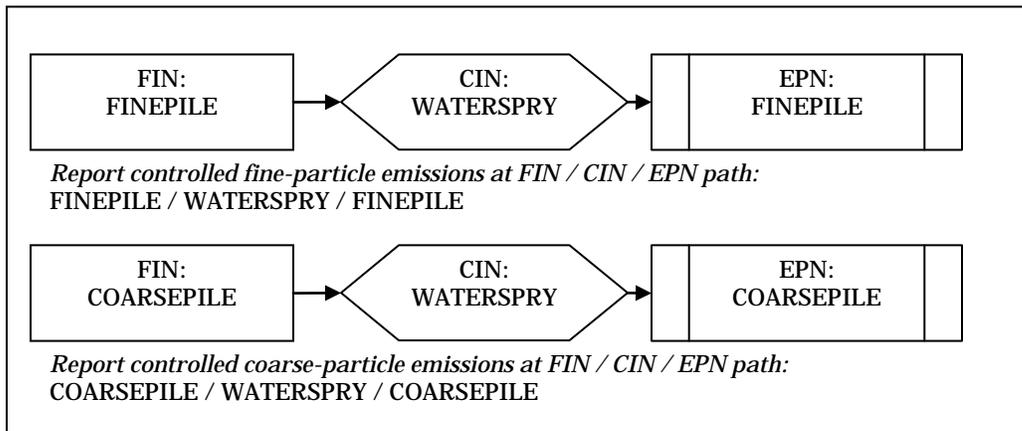


Figure 3-18. Fine and Coarse Piles—Emissions Controlled by Water Spray

Batch and Continuous Operations

Separate batch from continuous material-transport operations. For example, an operation moves limestone in batches from a quarry to a storage pile and then the limestone is fed continuously into a process stream. Represent this process as two separate facilities linked to two separate emission points, as shown in Figure 3-19.

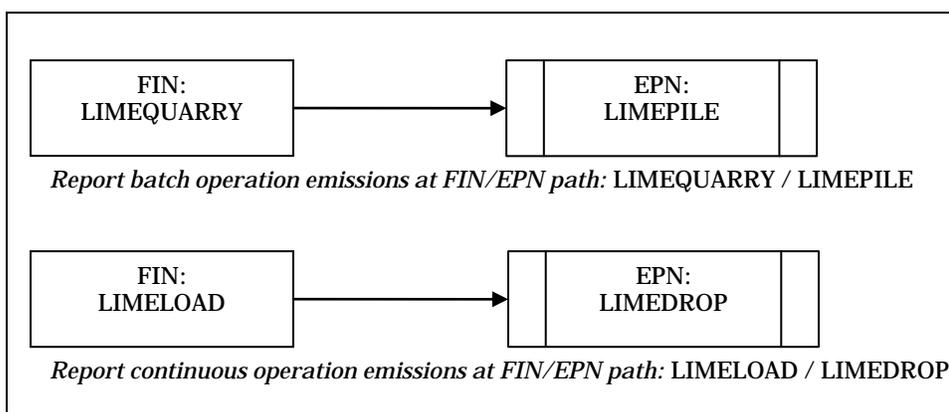


Figure 3-19. Continuous and Batch Operations Separated

Conveyor Transport Operations

Rather than grouping all conveyor transport operations under a single FIN / EPN path, represent each of the conveyor's interdependent operating systems separately. For example, represent a conveyor system that has both a fine- and a coarse-particle process line as two facilities linked to two emission points, shown in Figure 3-20.

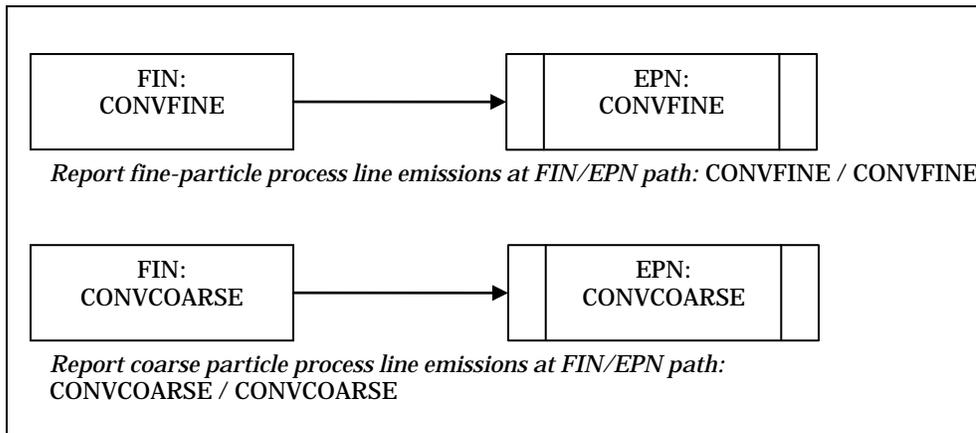


Figure 3-20. Conveyor Transport—Interdependent Systems

Marine Operations

Rather than reporting all marine losses at a single FIN / EPN path, each individual equipment or process type should be uniquely identified in the EI. This section addresses correct structure for several common marine operations. Please contact the EAS for additional guidance on representing the structure of the marine facility.

Loading and Unloading Bulk Liquids

Unabated Loading Operations

If loading operations are uncontrolled, represent the emissions path from one or more vessels as a single facility linked to a single emission point, as shown in Figure 3-21.

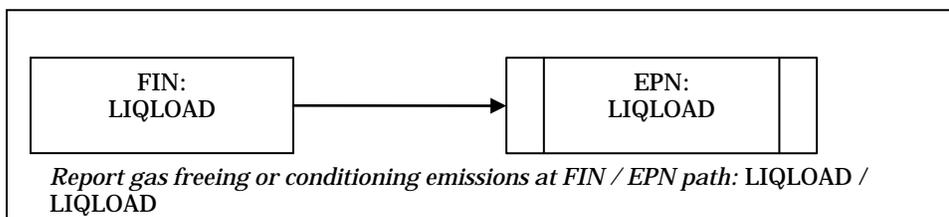


Figure 3-21. Uncontrolled Bulk Material Liquid Emissions

Using a Vapor Recovery System

If loading operations use a vacuum-assisted vapor recovery system, any uncollected emissions should be reported at the vessel, with the balance of emissions reported at the onshore equipment serving as a control device. For example, if the vapors captured by the vapor recovery system are routed to an incinerator, represent the loading operation and incinerator as two facilities linked to a single emission point, with both abatement devices added to the loading operation. Then link the loading facility to a separate emission point, as shown in Figure 3-22.

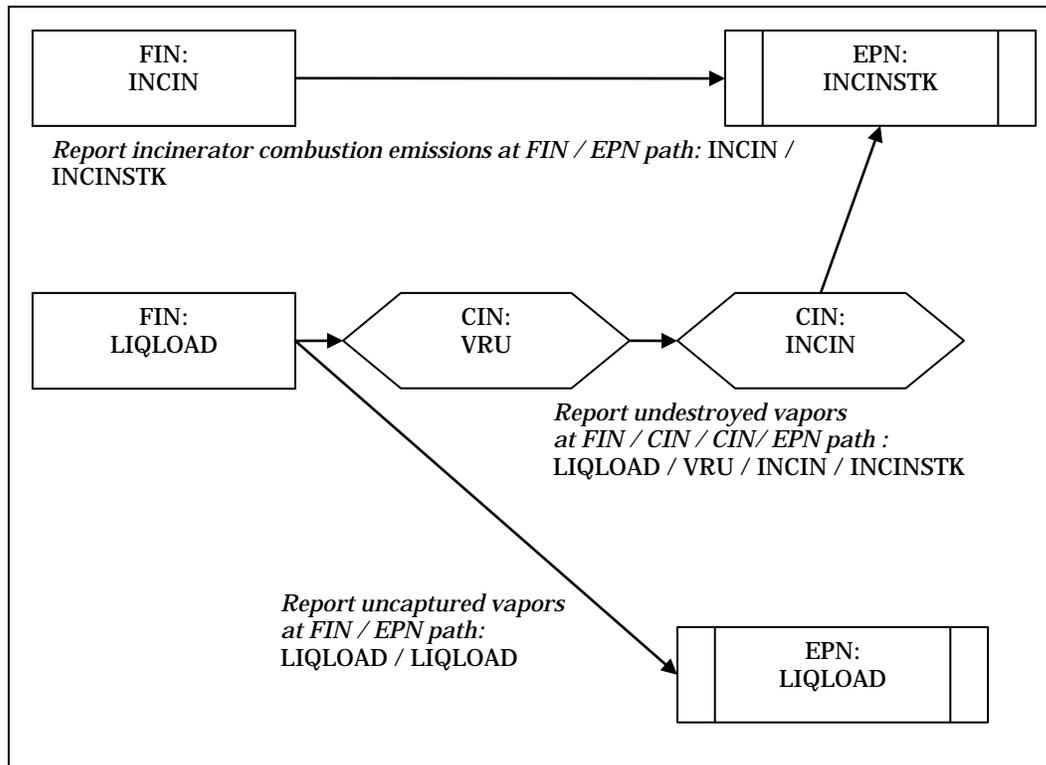


Figure 3-22. Liquid Loading Controlled by a Vapor Recovery Unit and Routed to an Incinerator

Loading and Unloading Bulk Liquefied Gaseous Materials

Since pressurized marine vessel compartments do not normally release to the atmosphere, loading and unloading bulk liquefied gaseous materials may generate fugitive emissions from equipment leaks. These should be reported at the appropriate equipment leak fugitive area on the dock.

If gas freeing or gas conditioning is performed, represent the path as a single facility linked to a single emission point, as shown in Figure 3-23.

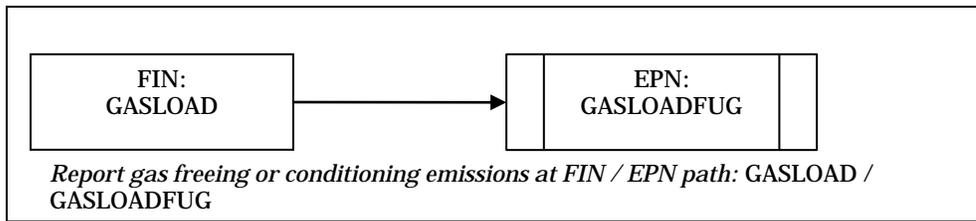


Figure 3-23. Uncontrolled Degassing and Cleaning Emissions

Loading and Unloading Solid Bulk Materials

Although unloading operations are not limited to the use of hoppers or pneumatic systems, those are perhaps the most common methods. Pneumatic systems transfer material to silos or storage tanks, where air is separated from the material and vented to a baghouse or cyclone. Represent this loading operation as a single facility linked to a single emission point, with an abatement device added to the loading operation, as shown in Figure 3-24.

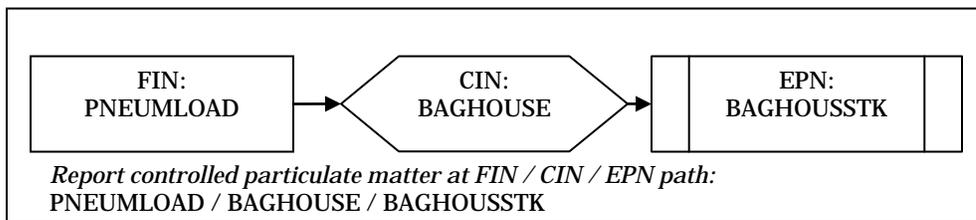


Figure 3-24. Pneumatic Transfer of Solids Controlled by a Baghouse

Degassing and Cleaning Liquid Vessel Compartments

Emissions from liquid vessel cleaning and degassing will occur either from the vessel itself (if the vessel does not have a vapor recovery system) or from the shore-based control equipment.

Unabated Vessel Cleaning and Degassing

If the vessel does not have a vapor recovery system, represent the vessel cleaning and degassing as a single facility linked to a single emission point, as shown in Figure 3-25.

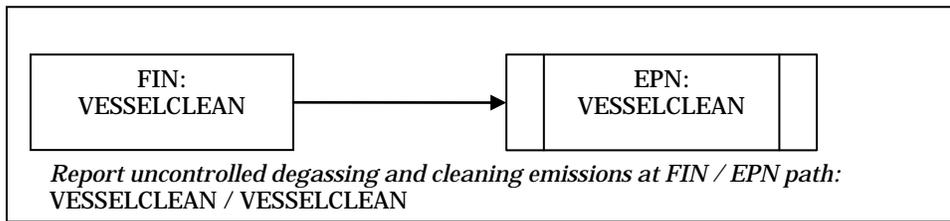


Figure 3-25. Uncontrolled Degassing and Cleaning Emissions

Using a Vapor Recovery System

If the vessel has a vapor recovery system, the captured vapors are routed to shore-based control equipment. For example, if the vapors are routed to an incinerator, represent the vessel cleaning and degassing and the incinerator as two facilities linked to a single emission point, with two abatement devices added to the vessel cleaning and degassing facility. Then link a separate emission point to the vessel cleaning and degassing facility, as shown in Figure 3-26.

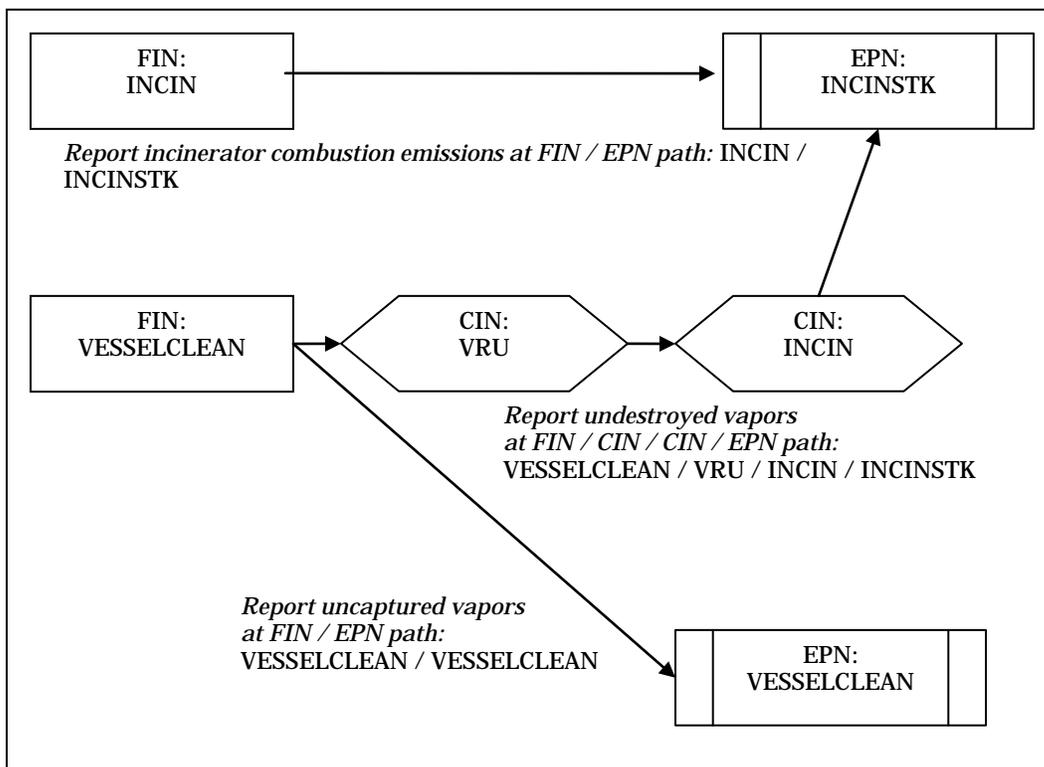


Figure 3-26. Degassing and Cleaning Emissions Captured by a VRU and Routed to an Incinerator

Wastewater Collection and Treatment

Because wastewater collection and treatment involve several different processes, an entire wastewater collection and treatment system should not be represented by a single path. Instead, represent each of the system's processes, including collection, by a unique FIN / EPN path. For assistance with establishing or modifying the wastewater plant's structure, contact the EAS.

Chemical Production

Do not represent an entire chemical plant by a single facility linked to multiple emission points. If the emission sources are to be grouped by plant, each group should be assigned a unique plant identification number. Each source within a plant should be assigned a unique FIN / EPN path.

Chemical plant structures vary widely. For assistance with establishing or modifying the plant's structure, contact the EAS.

Modifying Existing Emissions Inventory Structure

If the EI structure is incorrect, or if it has changed because new equipment has been added or existing equipment has been newly linked, the structure should be modified by submitting the appropriate forms available in *2011 Emissions Inventory Forms and Instructions* (publication number RG-360B/11) or at the EAS Web page, <www.tceq.texas.gov/goto/ieas>. The remainder of this chapter tells how to make common structural modifications.

Removing Structure

For historical reasons, the EAS does not normally delete structure or emissions records. If a facility has been permanently shut down or removed from the site, simply change its status accordingly and zero all emission rates. If a facility operated at any time during the emissions inventory year, the operating status should be marked as "active."

Changing Facility and Emission Point Designations

The EAS does not normally allow changes to facility or emission point designations due to the historical nature of emissions data. Exceptions to this policy will be made to correct errors or to align EI nomenclature with permit nomenclature. If revisions to facility or emission point designations are necessary, submit a Revision Request form available in the *2011 Emissions Inventory Forms and Instructions* (RG-360B/11) or at the EAS Web page, <www.tceq.texas.gov/goto/ieas>. Be sure to give a reason for the requested revisions. The EAS reserves the right to approve or disapprove all such revision requests.

Adding a New Emission Point to an Existing Facility

To add a new emission point to an existing facility:

- list the new path on one line of the Structural Overview form;
- complete an Emission Point Information form; and
- complete a Path Emissions form, noting that the facility “Already exists in STARS database.”

Example: If a new flare, EPN: FL, needs to be linked to an existing tank, FIN: TK:

- enter the new FIN: TK / CIN: FL / EPN: FL path on the Structural Overview form, since the flare will also act as a control device to control the tank’s emissions;
- complete an Abatement Device Information form for the flare;
- complete an Emission Point Information form for the flare, including the form’s Flare Information section;
- complete a Path Emissions form for the FIN: TK / CIN: FL / EPN: FL path, noting that the FIN: FL “Already exists in STARS database”;
- enter the new FIN: FL / EPN: FL path on the Structural Overview form because the flare is also an emissions source (a facility) in this case;
- complete the Facility Information for a Flare Combustion Unit form for the flare;
- complete a Path Emissions form for the FIN: FL / EPN: FL path; and
- complete a Material Throughput for Combustion Units form for the flare.

Adding a New Facility to an Existing Emission Point

To add a new facility to an existing emission point:

- list the new path on one line of the Structural Overview form;
- complete the appropriate Facility Information form as determined by the nature of the facility (combustion unit, storage tank, wastewater facility or other);
- complete a Path Emissions form, noting that the EPN: FL “Already exists in STARS database”; and
- complete the appropriate Material Throughput form.

Example: If a new tank, FIN: TK, needs to be added and the emissions are routed to an existing flare, EPN: FL:

- enter the new FIN: TK / CIN: FL / EPN: FL path on the Structural Overview form;
- complete the Facility Information for Storage Tanks form for the tank;

- complete a Path Emissions form for the FIN: TK / CIN: FL / EPN: FL path, noting that the EPN: FL “Already exists in STARS database”; and
- complete a Material Throughput for Storage Tanks form for the tank.

Linking an Existing Facility to an Existing Emission Point

To connect an existing facility to an existing emission point:

- list the new path on one line of the Structural Overview form and
- complete a Path Emissions form, noting that the FIN and EPN each “Already exists in STARS database.”

Example: If an existing tank, FIN: TK, is being connected to an existing flare, EPN: FL:

- enter the new FIN: TK / CIN: FL / EPN: FL path on the Structural Overview form and
- complete a Path Emissions form for the FIN: TK / CIN: FL / EPN: FL path, noting that the FIN:TK and EPN:FL each “Already exists in STARS database.”

Adding a New Abatement Device to an Existing FIN / EPN Path without Changing the Emission Point

To add a new abatement device to an existing FIN / EPN path, leaving the emission point unchanged:

- list the new path on one line of the Structural Overview form;
- complete an Abatement Device Information form; and
- complete a Path Emissions form for the new path, noting that the facility and emission point each “Already exists in STARS database.”

Example: To add a catalytic converter, CIN: CC, to an existing engine path FIN: COMP / EPN: STK:

- enter the new FIN: COMP / CIN: CC / EPN: STK path on the Structural Overview form;
- complete an Abatement Device Information form for CIN: CC;
- and complete a Path Emissions form for the new path, noting that the FIN: COMP and EPN: STK each “Already exists in STARS database.”

Adding a New CIN / EPN Path to an Existing Facility, Unlinking the Old Emission Point, and Linking the New CIN / EPN Path

To add a new abatement device to an existing FIN path, deactivate the old abatement device, and activate the new CIN / EPN path:

- list the new path on one line of the Structural Overview form;
- complete an Abatement Device Information form;
- complete an Emission Point Information form for the new emission point;
- complete a Path Emissions form for the new path, noting that the facility “Already exists in STARS database”; and
- mark the status of the old path on the EIQ (where the facility is linked to the old emission point) as “DEACTIVATED.”

Example: Suppose that all emissions from an existing tank, FIN: TK, are now sent to a new flare, EPN: FL:

- enter the new FIN: TK / CIN: FL / EPN: FL path on the Structural Overview form;
- complete an Abatement Device Information form for the flare;
- complete an Emission Point Information Flare form for the flare;
- complete a Path Emissions form for the FIN: TK / CIN: FL / EPN: FL path, noting that the FIN:TK “Already exists in STARS database”;
- mark the status of the FIN / old EPN path as appropriate on the EIQ;
- enter the new FIN: FL / EPN: FL path on the Structural Overview form, because, in this case, the flare is also an emissions source (a facility);
- complete the Facility Information for Flare Combustion Units form for the flare;
- complete a Path Emissions form for the FIN: FL / EPN: FL path; and
- complete a Material Throughput for Combustion Units form for the flare.

Adding an Existing Abatement Device to an Existing FIN / EPN Path without Changing the Emission Point

To add an existing abatement device to an existing FIN / EPN path, leaving the emission point unchanged:

- list the new path on one line of the Structural Overview form and
- complete a Path Emissions form for the new path, noting that the facility, emission point, and abatement device “Already exists in STARS database.”

Adding an Existing Abatement Device to an Existing Facility, Unlinking the Old Emission Point, and Linking the New CIN / EPN Path

To add an existing abatement device to an existing facility, deactivate the old emission point, and activate the new CIN / EPN path:

- list the new path on one line of the Structural Overview form;
- complete an Emission Point Information form if the abatement device is not already an emission point elsewhere in the EIQ;
- complete a Path Emissions form for the new path, noting that the facility, emission point, and abatement device each “Already exists in STARS database”; and
- mark the status of the old path on the EIQ (where the old facility is linked to the old emission point) as “DEACTIVATED.”